



**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION**

IN RE: §
 JORGE C. ZAMORA-QUEZADA, M.D., § CASE NO. 16-70270
 M.P.H., P.A., §
 §
 Debtor. § CHAPTER 7

ENTERED
01/10/2017

**AGREED ORDER ON
 [DOC#106] JOINT EMERGENCY MOTION FOR ORDER COMPELLING
 TURNOVER AND ACCOUNTING FROM CENTER FOR ARTHRITIS AND
OSTEOPOROSIS I, P.A. AND DR. JORGE ZAMORA-QUEZADA**

CAME ON FOR CONSIDERATION the Joint Emergency Motion For Order Compelling Turnover And Accounting From Center For Arthritis And Osteoporosis I, P.A. And Dr. Jorge Zamora-Quezada (the “**Motion**”), and the objections thereto of the Debtor, the Center For Arthritis And Osteoporosis I, P.A. (“**Center P.A.**”), and Dr. Zamora, and the Court having considered the Motion and the objections, and the agreement of the parties as reflected in this agreed order, finds cause exists to grant the Motion in part and deny the Motion in part, without prejudice to any party, as set forth below, it is hereby

ORDERED that the hearing on the Motion set for December 28, 2016, is cancelled; further

ORDERED that on or before December 29, 2016, Debtor shall produce to Trustee and Hitachi the following:

- All bank statements for the Debtor’s four bank accounts for 2015 and for Jan - July 2016 (Except for one June 2016 statement on one of the accounts Debtor cannot find)
- The Quickbooks-generated reports that were used to prepare the Debtor’s amended bankruptcy schedules.

FURTHER ORDERED that on or before January 4, 2017, Debtor, Center P.A., or Dr. Zamora shall produce to Trustee and Hitachi the following:

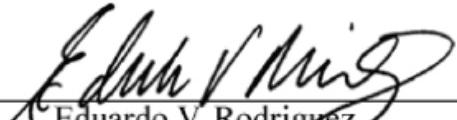
- Center PA's bank account statements for 2016 for all accounts that receive incoming payments from Medicare, Medicaid, or insurance companies
- All non privileged written communications sent or received about Center PA taking over the medical practice of the Debtor
- A list of all property related to the medical practice that is owned by J & M Family LP, and any formal appraisals of that property
- Print outs from Dr. Zamora's electronic medical record system for January – October 13, 2016.
- Source data from Quickbooks system for Zamora PA (2016)
- Any communications between Debtor or Center PA and Long Chilton during 2016

FURTHER ORDERED that Trustee and Hitachi shall use all documents produced under this order solely in connection with this bankruptcy case (and adversaries in this bankruptcy Court, or any appeal therein), and shall not use or disclose them for any other purpose or in any other manner without the express written consent of Dr. Zamora or a Court order.

FURTHER ORDERED that nothing in this Order shall affect in any way any party's position with respect to the validity, status, viability, or enforceability of the Supplemental Order dated June 30, 2016, *Hitachi Med. Sys. Am., Inc. v. JCZQ Family L.P.*, Adversary No. 16-7020 (removed from No. CL-16-0899-E, Co. Ct. at Law No. 7, Hidalgo County, Tex.).

ORDERED that the Court retains jurisdiction to enforce and interpret this Order.

Signed: January 10, 2017



Eduardo V. Rodriguez
United States Bankruptcy Judge

AGREED:

/s/ Nathaniel Peter Holzer

Nathaniel Peter Holzer
Jordan, Hyden, Womble, Culbreth & Holzer, P.C.
500 North Shoreline Blvd., Suite 900
Corpus Christi, Texas 78401-0341
Telephone: (361) 884-5678
Facsimile: (361) 888-5555
pholzer@jhwclaw.com
COUNSEL FOR DEBTOR

/s/ Michael B. Schmidt

Michael B. Schmidt
State Bar No. 17775200
Law Office of Michael B. Schmidt
401 Grant Place
Corpus Christi, TX 78411
Telephone: (361) 884-9949
Facsimile: (361) 884-6000
CHAPTER 7 TRUSTEE

/s/ Craig A. Stanfield

Craig A. Stanfield
State Bar No. 24051371
Morgan, Lewis & Bockius, LLP
1000 Louisiana Street, Suite 4000
Houston, TX 77002
Telephone: (713) 890-5000
Facsimile: (713) 890-5001
craig.stanfield@morganlewis.com
COUNSEL FOR HITACHI MEDICAL SYSTEMS AMERICA, INC.